

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No:</b>	<b>16-09415</b>
<b>Rosemary Blake</b>	)	<b>Chapter:</b>	<b>Chapter 13</b>
<b>Debtor</b>	)		
	)	<b>Judge:</b>	<b>Timothy A. Barnes</b>

**NOTICE OF MOTION**

**To:** Rosemary Blake, 118 Birch St. #B7, Park Forest, IL, 60466

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **March 21, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **Timothy A. Barnes** at 219 S. Dearborn, Courtroom 744, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley  
Dale Riley

**CERTIFICATE OF SERVICE**

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 2/26/2019.

By: /s/Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960

AFNI Bankruptcy Department PO Box 3097 Bloomington IL 61702	Merchants Credit Guide Attn: Bankruptcy Dept. 223 W Jackson Blvd Ste 4 Chicago IL 60606	Radiology Imaging Consultants Bankruptcy Department PO Box 1886 Harvey IL 60426
American Financial CRE Attn: Bankruptcy Dept. 10333 N Meridian St Ste Indianapolis IN 46290	MiraMed Revenue Group Bankruptcy Department Dept. 77304, PO Box 77000 Detroit MI 48277	Regional Recovery SERV Attn: Bankruptcy Dept. 5252 S Homan Ave Hammond IN 46320
Blue Cross Blue Sheild Attn: Mia Jacob 300 East Randolph Chicago IL 60601	Nissan-Infiniti LT Attn: Bankruptcy Dept. 2901 Kinwest Pkwy Irving TX 75063	Specialty Physicians  38132 Eagle Way Chicago IL 60678
Capital ONE BANK USA N Attn: Bankruptcy Dept. 15000 Capital One Dr Richmond VA 23238	Northwest Collectors Attn: Bankruptcy Dept. 3601 Algonquin Rd Ste 23 Rolling Meadows IL 60008	St. Elizabeth's Hospital Attn: Bankruptcy Department 1431 N. Claremont Ave. Chicago IL 60622
Commonwealth Financial Attn: Bankruptcy Dept. 245 Main St Dickson City PA 18519	Overland Bond & Investment Bankruptcy Department 4701 W. Fullerton Ave. Chicago IL 60639	St. James Health Center Bankruptcy Department 37653 Eagle Way Chicago IL 60678
EOS CCA Bankruptcy Department PO Box 806 Norwell MA 02061	Pendrick Capital partners II LLC  Po Box 1022 Wixom MI 48393	Clerk, First Mun Div Bankruptcy Dept. 50 W. Washington St., Rm. 1001 Chicago IL 60602
Equifax Attn: Bankruptcy Dept. PO Box 740241 Atlanta GA 30374	Personal Finance CO Attn: Bankruptcy Dept. 17507 South Kedzie Hazel Crest IL 60429	Ronald J Hennings Bankruptcy Department PO Box 4106 Saint Charles IL 60174
Experian Attn: Bankruptcy Dept. PO Box 2002 Allen TX 75013	Phoenix Financial SERV Attn: Bankruptcy Dept. 8902 Otis Ave Ste 103A Indianapolis IN 46216	State Collection Servi Attn: Bankruptcy Dept. 2509 S Stoughton Rd Madison WI 53716
Franciscan Alliance Bankruptcy Dept 28044 Network Place Chicago IL 60673	Phoenix Financial Services  Po Box 361450 Indianapolis IN 46236	Syncb/CARE CREDIT Attn: Bankruptcy Dept. 950 Forrer Blvd Kettering OH 45420
Ingalls Memorial Hospital Bankruptcy Dept 10024 Skokie Blvd Skokie IL 60077	Primary Healthcare Assoc. Attn: Bankruptcy Department 4647 W. Lincoln Hwy. Matteson IL 60443	Syncb/JCP Attn: Bankruptcy Dept. Po Box 965007 Orlando FL 32896
MBB Attn: Bankruptcy Dept. 1460 Renaissance Dr Park Ridge IL 60068	Professional clinical laboratories, LLC  555 W. Court St., STE 300 Kankakee IL 60901	Transunion Attn: Bankruptcy Dept. PO Box 1000 Chester PA 19022
Medical Recovery Specialists Bankruptcy Department 2250 E. Devon Ave., Ste. 352 Des Plaines IL 60018	Pulmonary and Sleep Associates Inc.  PO Box 688 Mokena IL 60448	United Revenue CORP Attn: Bankruptcy Dept. 204 Billings St Ste 120 Arlington TX 76010

Village OF PARK Forest-Finance  
C/O EOS CCA  
Po Box 981025  
Boston MA 02298

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Debtor ) Chapter: Chapter 13  
 )  
 ) Judge: Timothy A. Barnes

## **MOTION TO MODIFY CONFIRMED PLAN**

NOW COMES the Debtor, Ms. Rosemary Blake (the "Debtor"), by and through her attorneys, Geraci Law L.L.C., to present her **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
  2. The Debtor filed her Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 03/18/2016.
  3. The Debtor’s plan was confirmed by the Court on 05/12/2016, including a provision requiring the Debtor to turn her federal tax refunds over to the Trustee as additional payments into the plan.
  4. The Trustee has since adopted a policy of permitting Debtors to keep \$1,200 of each year’s tax refund to help with household expenses.
  5. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to permit the Debtor to keep \$1,200 of each year’s tax refund beginning with her 2018 refund.

Court enter an order:

1. Permitting the Debtor to keep \$1,200 of each year's tax refund beginning with her 2018 refund,
2. Any other relief the court deems proper.

By: /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.  
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Chicago, Illinois 60603  
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